

# Fact Sheet



## *For Proposed Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 28, 2007.

Permit Number: **R30-08300025-2007**  
Application Received: **August 6, 2010**  
Plant Identification Number: **03-54-083-00005**  
Permittee: **Armstrong Hardwood Flooring Company**  
Facility Name: **Beverly Mill**  
Mailing Address: **160 Route 250 South, Beverly, WV 26253**

Permit Action Number: *MM03*      Revised: Proposed

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Physical Location:	Beverly, Randolph County, West Virginia
UTM Coordinates:	597.41 km Easting • 4,296.88 km Northing • Zone 17
Directions:	From Charleston take I-79 North to exit 99, proceed east on US Route 33 to Elkins. From Elkins take US Route 250 South. The facility is located approximately 1.6 miles south of Beverly in Randolph County.

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### **Facility Description**

The Beverly facility manufactures finished and unfinished hardwood flooring under Standard Industrial Classification (SIC) code 2426. Green lumber is purchased and stacked in the Mill Yard to facilitate air drying of the lumber. The lumber is then further dried in the steam heated pre-dryer and/or one of 38 lumber kilns. Kiln-dried lumber is transferred by one of three lumber tilts to the Mill rough end saws. The rough end saws cut the lumber into strips for transfer to one of six lines of knot saws, side matchers, and end matchers. The unfinished wood flooring is graded, stacked and either stored or transferred to one of two finishing lines. Finished hardwood flooring is graded and packaged for shipment to mill customers.

This modification is necessitated by Armstrong's desire to increase processing capacity. Changes include reducing the drying stick thickness allowing more wood to be processed in the kilns, which will increase VOC emissions. The increased kiln capacity will allow the output capacity of the flooring mill to be increased; this will require revision to the PM and PM10 limits.

## Emissions Summary

According to the Title V permit application, this facility's potential to emit (PTE) will increase as described below:

Pollutant	Change in PTE	
	lb/hr	tons/year
PM	+0.33	+1.45
PM10	+0.07	+0.29
VOCs	+0.28	+1.21

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and volatile organic compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Armstrong Hardwood Flooring Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Operating permit requirement.
	45CSR30	
State Only:	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1147L	September 7, 2010	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

### Yard Operations—Lumber Kilns (Emission Unit 004-01)

Armstrong intends to decrease the drying stick thickness by 1/8" from 7/8" to 3/4" allowing more wood to be processed in the kilns, thus increasing the kiln processing capacity from 95.5 million board feet per year to 130 million board feet per year. The emission units table has been updated to reflect this change.

VOC emissions associated with the kiln processes will increase proportionally as a result of this change.

### Flooring Mill Operations (Emission Unit 003-01)

The reduced drying stick thickness and increased kiln capacity will allow Armstrong to increase the output capacity of the flooring mill to 29,500 square feet per mill line per shift. The emission units table has been updated to reflect this change.

### Greenhouse Gas Reporting

Conditions 3.1.12. and 3.5.11. were added to address greenhouse gas reporting per 45CSR42. All greenhouse gases emitted above the *de minimis* amounts must be reported.

### Baghouses #7 and #8 (Emission Units 010 and 011)

Baghouses #7 and #8 service the Flooring Mill. The capacity has increased due to the increased capacities Mill lines. The emission units table has been updated to reflect these changes.

Condition 5.1.1. lists maximum particulate matter emission rates for the baghouses. Due to the increased capacities through the Mill, the particulate limits for baghouses #7 and #8 were increased.

### Baghouses' Pressure Drops

Armstrong measures the pressure drops in baghouses #1-8. A pressure drop ranging from 0.75-6.5 inches of water, as specified in Conditions 5.2.2. and 6.2.2., has been previously considered indicative of normal operations.

Armstrong has requested the operating ranges be changed to 0.2 up to 6.5 inches of water for baghouses #1 through #8. Armstrong has found that when the bags are replaced they see 0.2 inches for several days to weeks.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

## Comment Period

Beginning Date: N/A  
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Rex Compston  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.